

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

William B. Cook

Case No.: 18-15374(MDC)

Debtor (s)

Chapter 13

MOTION TO INCUR NEW DEBT

COMES NOW, William B. Cook, hereinafter referred to as “Debtor”, by and through his undersigned counsel, respectfully moves this Honorable Court for an Order Allowing Debtor to Incur New Debt and in support thereof aver as follows:

1. Debtor filed a Chapter 13 Bankruptcy on or about July 27, 2018.
2. The Chapter 13 filing was assigned case number 18-14975-ELF.
3. The Chapter 13 Plan was confirmed by this Honorable Court on or about March 12, 2020.
4. Debtor is desirous of purchasing real property and is currently in the market to purchase real property.
5. On or about June 30, 2020, Debtor was approved for a mortgage to purchase property in the amount of \$400,000.00. A true and correct copy of the letter of approval is attached here and labeled as “**Exhibit A.**”
6. The Chapter 13 Plan will remain a 100% plan and the unsecured creditors will not be affected. The Debtor is current on payments to the Trustee.
7. In consideration thereof, Debtor requests this Honorable court to enter an order allowing him to incur new debt to finance and purchase a property within ten percent (10%) of the pre-approval amount.

WHEREFORE, the Debtor requests an Order allowing him to incur new debt to finance and purchase real property.

Dated: July 10, 2020

/s/Brad J. Sadek, Esq
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